



SUSANA MARTINEZ  
Governor  
JOHN A. SANCHEZ  
Lieutenant Governor

## NEW MEXICO ENVIRONMENT DEPARTMENT

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RYAN FLYNN  
Cabinet Secretary  
BUTCH TONGATE  
Deputy Secretary

### **Certified Mail - Return Receipt Requested**

May 2, 2016

Mr. James Gallegos, Superintendent  
Mora Independent School District  
Post Office Box 179  
Mora, New Mexico 87732

**RE: Minor Industrial, SIC 4971, NPDES Compliance Evaluation Inspection, Mora Independent School District Athletic Field, NM0031079, April 27, 2016**

Dear Mr. Gallegos:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Racquel Douglas  
US Environmental Protection Agency, Region VI  
Enforcement Branch (6EN-WM)  
Fountain Place  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Bruce Yurdin  
New Mexico Environment Department  
Surface Water Quality Bureau  
Point Source Regulation Section  
P.O. Box 5469  
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Sandra Gabaldon at (505) 827-1041 or at [sandra.gabaldon@state.nm.us](mailto:sandra.gabaldon@state.nm.us).

Sincerely,

Bruce J. Yurdin  
Program Manager  
Point Source Regulation Section  
Surface Water Quality Bureau

cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail  
Racquel Douglas, USEPA (6EN-WM) by e-mail  
Gladys Gooden-Jackson (6EN-WC) by e-mail  
NMED District II, Manager, by e-mail

Mr. James Gallegos, by e-mail  
[jgallegos@mora.k12.nm.us](mailto:jgallegos@mora.k12.nm.us)



Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

## NPDES Compliance Inspection Report

### Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="N"/> <input type="text" value="M"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="3"/> <input type="text" value="1"/> <input type="text" value="0"/> <input type="text" value="9"/> <input type="text" value="7"/> 11 12 <input type="text" value="1"/> <input type="text" value="6"/> <input type="text" value="0"/> <input type="text" value="4"/> <input type="text" value="2"/> <input type="text" value="7"/> 17 18 <input type="text" value="C"/> 19 <input type="text" value="S"/> 20 <input type="text" value="1"/>					
<input type="text" value="M"/> <input type="text" value="I"/> <input type="text" value="N"/> <input type="text" value="O"/> <input type="text" value="R"/> <input type="text" value="I"/> <input type="text" value="N"/> <input type="text" value="D"/> <input type="text" value="U"/> <input type="text" value="S"/> <input type="text" value="T"/> <input type="text" value="R"/> <input type="text" value="I"/> <input type="text" value="A"/> <input type="text" value="L"/>					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="text" value="1"/> 69	70 <input type="text" value="2"/>	71 <input type="text" value="N"/>	72 <input type="text" value="N"/>	73 <input type="text" value=""/>	74 <input type="text" value=""/>
				75 <input type="text" value=""/>	80 <input type="text" value=""/>

### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) <b>Mora Independent School District Athletic Field</b> I-25 North, Exit 345, Left on University Avenue, Right on Highway 518. Follow 518 to Mora Independent Schools. <b>MORA COUNTY</b>	Entry Time /Date 1010 Hours / April 27, 2016	Permit Effective Date September 1, 2012
	Exit Time/Date 1045 Hours/ April 27, 2016	Permit Expiration Date August 31, 2017
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Miguel Martinez, Chief Financial Officer		Other Facility Data N 35°58'34.26" W -105°19 '59.13" SIC: 4971
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. James Gallegos, Superintendent / (505) 303-9570 Post Office Box 179 Mora, New Mexico 87732		
Contacted Yes <input type="text" value="*"/> No <input type="text" value=""/>		

### Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<input type="text" value="S"/> Permit	<input type="text" value="S"/> Flow Measurement	<input type="text" value="S"/> Operations & Maintenance	<input type="text" value="N"/> CSO/SSO
<input type="text" value="U"/> Records/Reports	<input type="text" value="U"/> Self-Monitoring Program	<input type="text" value="N"/> Sludge Handling/Disposal	<input type="text" value="N"/> Pollution Prevention
<input type="text" value="S"/> Facility Site Review	<input type="text" value="N"/> Compliance Schedules	<input type="text" value="N"/> Pretreatment	<input type="text" value="N"/> Multimedia
<input type="text" value="N"/> Effluent/Receiving Waters	<input type="text" value="N"/> Laboratory	<input type="text" value="N"/> Storm Water	<input type="text" value=""/> Other:

### Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Please see checklist and further explanations for details of findings

Name(s) and Signature(s) of Inspector(s) Sandra Gabaldon	Agency/Office/Telephone/Fax NMED/SWQB/(505) 827-1041/(505) 827-0160	Date
Signature of Management QA Reviewer Jennifer Foote, Municipal Team Lead	Agency/Office/Phone and Fax Numbers NMED/SWQB/(505) 827-0596/(505) 827-0160	Date

MORA INDEPENDENT SCHOOL DISTRIC ATHLETIC FIELD		PERMIT NO. NM0031097
SECTION A – PERMIT VERIFICATION		
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>NO</u> )		
DETAILS:		
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
4. ALL DISCHARGES ARE PERMITTED		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
SECTION B – RECORDKEEPING AND REPORTING EVALUATION		
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. <input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>NO</u> )		
DETAILS: The facility is groundwater discharge permit with monitoring requirements during discharge. This facility has not discharged. However, they have not submitted any Discharge Monitoring Reports (DMRs) stating “No Discharge” The permittee needs to do all DMRs and submit to EPA through NetDMR as soon as possible.		
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.		<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
c) ANALYTICAL METHODS AND TECHNIQUES.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
e) DATES AND TIMES OF ANALYSES.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.		<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.		<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA
SECTION C – OPERATIONS AND MAINTENANCE		
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>NO</u> )		
DETAILS:		
1. TREATMENT UNITS PROPERLY OPERATED.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
2. TREATMENT UNITS PROPERLY MAINTAINED.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED .		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE		<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.		<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED. The facility consists of three groundwater pumps.		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA

MORA INDEPENDENT SCHOOL DISTRIC ATHLETIC FIELD		PERMIT NO. NM0031097	
SECTION C – OPERATIONS AND MAINTENANCE (CONT'D)			
9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
SECTION D – SELF-MONITORING			
PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. DETAILS:		<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>YES</u> ).	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
6. SAMPLE COLLECTION PROCEDURES ADEQUATE		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
a) SAMPLES REFRIGERATED DURING COMPOSITING.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
b) PROPER PRESERVATION TECHNIQUES USED.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
SECTION E – FLOW MEASUREMENT			
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. DETAILS:		<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>NO</u> .)	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE: Inline totalizer of three wells, which is measured monthly.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
4. CALIBRATION FREQUENCY ADEQUATE. RECORDS MAINTAINED OF CALIBRATION PROCEDURES. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
6. HEAD MEASURED AT PROPER LOCATION.		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.		<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	
SECTION F – LABORATORY			
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. DETAILS: NO DISCHARGE – NO SAMPLES		<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED <u>NO</u> .)	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	

MORA INDEPENDENT SCHOOL DISTRIC ATHLETIC FIELD						PERMIT NO. NM0031097	
SECTION F - LABORATORY (CONT'D)							
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA	
4. QUALITY CONTROL PROCEDURES ADEQUATE.						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA	
5. DUPLICATE SAMPLES ARE ANALYZED. <u>100</u> % OF THE TIME.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
6. SPIKED SAMPLES ARE ANALYZED. <u>   </u> % OF THE TIME.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
7. COMMERCIAL LABORATORY USED. FACILITY HAS NOT CONTRACTED WITH ANY LABORATORY TO DO ANALYSES OF SAMPLES.						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA	
LAB NAME							
LAB ADDRESS							
PARAMETERS PERFORMED							

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. <input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED YES ).							
OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	
RECEIVING WATER OBSERVATIONS <u>   </u> Receiving water had a slightly milky white color							

SECTION H - SLUDGE DISPOSAL							
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. DETAILS:						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA (FURTHER EXPLANATION ATTACHED NO ).	
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY.						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA	
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503.						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA	
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: <u>          </u> (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)							

SECTION I - SAMPLING INSPECTION PROCEDURES (FURTHER EXPLANATION ATTACHED <u>   </u> ).							
1. SAMPLES OBTAINED THIS INSPECTION.						<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA	
2. TYPE OF SAMPLE OBTAINED							
GRAB <u>                  </u>		COMPOSITE SAMPLE <u>   </u>		METHOD <u>                  </u>		FREQUENCY	
3. SAMPLES PRESERVED.						<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	
4. FLOW PROPORTIONED SAMPLES OBTAINED.						<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE.						<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	
6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE.						<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	
7. SAMPLE SPLIT WITH PERMITTEE.						<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED.						<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT.						<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	

Mora Independent School District Athletic Field  
NPDES Permit No. NM0031097  
Compliance Evaluation Inspection  
Date of Inspection: April 27, 2016

**Introduction:**

On April 27, 2016, Sandra Gabaldon and Daniel Valenta of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Mora Independent School District Athletic Field. The athletic field has an intermittent flow design capacity (the system is only used when the ground water table is high) and is classified as a minor industrial discharge under the federal Clean Water Act, Section 402, of the National Pollutant Discharge Elimination System (NPDES) permit program. The athletic field is assigned permit number NM0031097. This permit regulates the discharge to the Mora River in the Canadian Basin in Segment 20.6.4.309 according to the *State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 NMAC*. This segment includes the designated uses of domestic water supply, irrigation, high quality coldwater aquatic life, livestock watering, wildlife habitat, primary contact, and public water supply.

The NMED performs a certain number of CEIs for the U.S. Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program in accordance with the federal Clean Water Act. USEPA uses these inspections to determine compliance with the NPDES permit program. This inspection report is based on information provided by the permittee's representatives, observations made by the NMED inspectors, and records and reports kept by the permittee and/or NMED.

Upon arrival at the facility at 1010 hours on April 27, 2016, the inspectors conducted an entrance interview with Miguel Martinez, Chief Financial Officer (CFO). The Superintendent of the Mora Independent School District, Mr. James Gallegos was unavailable during this inspection. Introductions were made with Mr. Martinez along with presentation of credentials. The purpose of the inspection was explained to Mr. Martinez. An exit interview was held via telephone with Mr. Gallegos on May 2, 2016 at approximately 0915 hours to present the preliminary findings of the inspection.

**Treatment Scheme:**

The Mora High School athletic field is located in an area where the ground water table is typically high during the spring runoff season. Historically, this would cause issues with standing water in the field. In 2012, a project was started to resolve the standing water issue.

Three ground water pumps (with inline flow meters) were installed at the athletic field to pump groundwater to the Mora River when the groundwater level reached 21 feet to the surface. The NPDES permit for this facility was issued on September 2012 with an expiration of August 31, 2017.

Mora Independent School District Athletic Field  
NPDES Permit No. NM0031097  
Compliance Evaluation Inspection  
Date of Inspection: April 27, 2016

**Further Explanations**

**Section B – Recordkeeping and Reporting – Overall Rating of “Unsatisfactory”**

The permit requires in Part I.C:

*Monitoring results must be reported either using the electronic or paper Discharge Monitoring Report (DMR) approved formats to EPA. If using paper DMR forms, the report shall also be sent to NMED and shall be submitted quarterly. Each quarterly submittal shall include separate forms for each month of the reporting period. See Part III, D.4 of the permit.*

- 1. Reporting periods shall end on the last day of the months March, June September and December.*
- 2. The permittee is required to submit regular quarterly reports as described above postmarked no later than the 28<sup>th</sup> day of the month following each reporting period.*

**Findings** for Recordkeeping and Reporting:

This facility has failed to submit **any** Discharge Monitoring Reports, either by mail or electronically to EPA. This facility is required to submit quarterly DMRs. DMRs can be submitted electronically at [https://netdmr.epa.gov/netdmr/public/getting\\_started.htm](https://netdmr.epa.gov/netdmr/public/getting_started.htm). The facility is required to submit DMRs if they are discharging **or** have no discharge.

**Section D – Self Monitoring – Overall Rating “Unsatisfactory”:**

The permit requires in Part III, A.2:

*The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Act and its grounds for enforcement action; for permit termination; revocation and reissuance, or modification; or for denial of a permit renewal application.*



**Findings** for Self-Monitoring:

The permittee has Limitations and Monitoring Requirements (See Part I, A.1) in the permit. The permittee is not prepared to take samples or have analyses done. If a discharge does occur, the permittee is responsible for monitoring the discharge. It is necessary for the permittee to find a laboratory, contract the laboratory, and prepare for any discharge that may occur.